

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America
ex rel. ALEX DOE, Relator,

The State of Texas
ex rel. ALEX DOE, Relator,

The State of Louisiana
ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

Planned Parenthood Federation of America,
Inc., Planned Parenthood Gulf Coast, Inc.,
Planned Parenthood of Greater Texas, Inc.,
Planned Parenthood South Texas, Inc.,
Planned Parenthood Cameron County, Inc.,
Planned Parenthood San Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-00022-Z

DECLARATION OF MELANEY LINTON

I, Melaney Linton, declare and state as follows:

1. I am currently the President and Chief Executive Officer of Planned Parenthood Gulf Coast, Inc. (“PPGC”). I have held this position since 2012. From 2007 to 2012, I was Chief Operating Officer of PPGC. I am over the age of 18 and have personal knowledge of the matters herein or have acquired such knowledge by personally examining business records kept in the ordinary course of PPGC’s business. If called upon to testify, I could and would testify thereto.

2. I make this declaration in support of Defendants’ Opposition to Relator’s Motion to Unseal Plaintiffs’ Response to Defendants’ Motion for Summary Judgment and Supplemental Appendix. I understand that the Relator is attempting to unseal Plaintiffs’ brief and 1,475-page supplemental appendix, and that some of the documents in Plaintiffs’ supplemental appendix were

designated by PPGC as “Confidential” or “Confidential Attorneys’ Eyes Only” under the Protective Order entered in this matter. Unsealing these materials would substantially and materially harm PPGC and others by disclosing trade-secret level, non-public information.

3. PPGC is a healthcare provider, and competes with other healthcare organizations for medical professionals and patients in the market place. As a 501(c)(3) non-profit organization, PPGC is also reliant on securing donations and other grants to fund its mission of providing high-quality reproductive healthcare to its patients in Texas and Louisiana. In that context, PPGC is competing with similarly situated organizations to secure access to donations and grants. In addition, PPGC’s mission elicits strong opposition actors who have conducted acts against PPGC that range from harassing business and mission partners to acts of violence.

4. I understand that only two of the documents designated by PPGC as “Confidential” or “Confidential Attorneys’ Eyes Only” were cited in Plaintiffs’ Response to Defendants’ Motion for Summary Judgment. PPGC does not object to unsealing APPX.006322–6402.

5. The other document was designated as “Confidential Attorneys’ Eyes Only Information” because it includes trade-secret level, highly sensitive business and financial information. *See* APPX.006301-6308.

6. The document, PPGC’s Board of Directors January 30, 2021 Retreat Minutes, include PPGC’s detailed financial information, fundraising information, strategic and programing priorities and plans, unrelated litigation updates from PPGC’s general counsel, detailed due diligence practices and compliance strategies, and detailed information about grant usage. This information is highly sensitive and is not information that PPGC releases to the public during the regular course of business. Disclosures of this financial information and fundraising strategy could affect donations, causing financial harm to PPGC. Disclosure of this financial information could

cause PPGC financial and competitive harm if obtained by the general public or by any of PPGC's healthcare provider competitors, as it would reveal information about PPGC's revenues. Disclosures of this strategic and programmatic information could also cause financial harm to PPGC if obtained by its healthcare provider competitors and could disrupt current systems and affect PPGC's ability to provide patient care. Disclosure of certain strategic material could also harm PPGC's ability to recruit and retain medical staff for its healthcare centers, causing financial and competitive harm.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on June 19, 2023 in Houston, Texas.


Melaney Linton